

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

TIERRA TELECOM, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:10-CV-0095 (TSE/JFA)
)	
LEVEL 3 COMMUNICATIONS, INC.,)	
et al.,)	
)	
Defendants.)	

GLOBAL CROSSING TELECOMMUNICATIONS, INC.'S
MOTION FOR PROTECTIVE ORDER

Defendant Global Crossing Telecommunications, Inc. ("Global Crossing"), by counsel, moves, pursuant to Fed. R. Civ. P. 26(c) for entry of a Protective Order barring the depositions of Robert Nance, Debra Swann, Adam Uzelac and Christopher Smith, which plaintiff Tierra Telecom, Inc. has noticed for April 29, 2010. The grounds for this motion are more fully set forth in Global Crossing's Memorandum in Support of Motion to Quash and for Protective Order, which is filed contemporaneously herewith. Counsel states that a good faith effort has been made between counsel to resolve the discovery matters at issue in accordance with Local Rule 37(E).

GLOBAL CROSSING
TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE

I certify that on this 16th day of April, 2010, a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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